

NB:WK
F.# 2011R01121

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

APPLICATION

- against -

Docket No.13-CR-517 (SJF)

CHI WEI KUO, also known as "Eddy Kuo,"

Defendant.

- - - - - X

WHITMAN G.S. KNAPP affirms as follows:

1. I am an Assistant United States Attorney in the Eastern District of New York.
2. On September 5, 2013, an indictment was filed against defendant CHI WEI KUO, also known as "Eddy Kuo," and a warrant for the defendant's arrest was issued by the Hon. Gary R. Brown. At that time, the indictment and arrest warrant were placed under seal.
3. In addition, on September 5, 2013, upon motion of the government, this Court ordered that the name "John Doe" be substituted for the defendant's name on the docket sheet, Court calendars and all documents not filed under seal in the above-captioned case.

4. The government believes that there is no longer reason for the indictment and arrest warrant to remain under seal, and that the government's compelling interests no longer outweigh the public's qualified right to access to the defendant's true name.

5. Accordingly, for the reasons set forth above, the government respectfully moves for an Order: (a) unsealing the indictment and arrest warrant; and (b) substituting the defendant's true name for "John Doe" on the docket sheet and all documents not filed under seal.

Dated: Brooklyn, New York
January 14, 2015

WHITMAN G.S. KNAPP
ASSISTANT UNITED STATES ATTORNEY